

Exhibit A

STATE OF NEW MEXICO
COUNTY OF BERNALILLO
SECOND JUDICIAL DISTRICT

No. **CV 20110 1355**

Gerald E. Valledor
Plaintiff,

vs. Lovelace medical center and co-defendants: Sarah Atkinson, Kevin
Sinclair, Carmen Smith-Salazar, Josephine Gonzales, Suzette Hannitz, Jennifer Holler.
Defendant.

SUMMONS

THE STATE OF NEW MEXICO

TO: Kevin Sinclair, Defendant
ADDRESS: 601 Martin Luther King AV. APO, NM 87102

You are required to serve upon Gerald Valledor an answer
(name of Plaintiff/Plaintiff's Attorney)

or motion in response to the complaint which is attached to this summons within thirty (30) days
after service of this summons upon you, exclusive of the day of service, and file a copy of your
answer or motion with the Court as provided in RULE 1-005 NMRA.

If you fail to file a timely answer or motion, default judgement may be entered against
you for the relief demanded in the Complaint/Petition.

Attorney(s) for Plaintiff/Plaintiff Pro Se:

Gerald Valledor
name, address and telephone of attorney for Plaintiff
(or of Plaintiff, if no attorney)
6304 Buena Vista Ave N.W.
Street or P.O. Box
Albuquerque, NM 87120
City, state and zip code
505-974-7422
telephone

WITNESS the Honorable TED BACA, district judge of the
Second Judicial District court of the State of New Mexico, and the seal of the district court of Bernalillo
County this _____ day of _____, 20____.

Dated: _____

FEB 04 2011
NITA DURAN
CLERK OF COURT
By [Signature]
Deputy

SECOND JUDICIAL DISTRICT COURT
COUNTY OF BERNALILLO
STATE OF NEW MEXICO

4 Feb 2011
ENDORSED
FILED IN MY OFFICE THIS

Plaintiff: Vallejos, Gerald E.

FEB 4 2011

Vs.

Defendant: Lovelace Medical Center, 601 Martin Luther King Av., Albuquerque, NM 87120 and
co-defendants: Carmen Smith-Salazar, Josephine Gorospe, Suzette Harris, Jennifer Hoffer, Sarah Atkinson, and Kevin Sinclair.

SECOND JUDICIAL DISTRICT COURT

Subject: Civil complaint for wrongful termination.

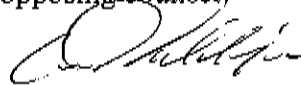
CV 20110 1355

Defendants retaliated against me for engaging in protected activities as defined under Title VII Of the Civil Rights Act of 1964 (Title VII), and the New Mexico Human Rights Act of 1969, and for filing employment discrimination charges 543-2009-00733, 543-2009-01162, and 543-2010-00698 dated 30Nov2010. Co-defendants retaliated against me by creating a hostile work environment for me, by defamation which was both cruel and malicious. The employer (Lovelace Medical Center) Sarah Atkinson, Nurse Manager, and Kevin Sinclair, Director Critical Care floor, denied me due process under the law. Allegations, and charges brought against me by other employees were never properly investigated. The personal relationship the manager and director had with the other co-defendants influenced their decision making, the decision not to allow me favorable personnel actions, the decision to terminate me after 19 years of service. I seek damages for loss of income, damage to my reputation as a Registered Nurse, for mental and Emotional anguish, for having to retire years earlier than I had planned.



Vallejos, Gerald E.
6304 Buenos Aires NW
Albuquerque, New Mexico 87120
505-974-7422

I certify that I have mailed a copy of this pleading to opposing counsel;



Vallejos, Gerald E.

LOUNDED PERE

SECOND JUDICIAL DISTRICT COURT
COUNTY OF BERNALILLO
STATE OF NEW MEXICO

FILED IN MY OFFICE THIS

FEB 4 2011

D-202- CV- **CV 20110 1355**

Quantita M. Duany
CLERK DISTRICT COURT

LOUGDES PEREZ

Serald E. Vallejos
PLAINTIFF

VS *Lovelace Medical Center 601 Martin Luther King AV. Albuquerque, NM 87102*
Carmen-Smith Salazar, Josephine Garza, Suzzette Harrison, Jennifer Hollen,
Sarah Atkinson, Kevin Sinclair.

DEFENDANT

COURT-ANNEXED ARBITRATION CERTIFICATION

(Party and Attorney) _____
pursuant to Second Judicial District Court Local Rule 2-603, certifies as follows:

_____ This party seeks only money judgment and the amount sought does not exceed twenty-five thousand dollars (\$25,000.00) exclusive of punitive damages, interest, costs and attorney fees.

☒ This party seeks relief other than a money judgment and/or seeks relief in excess of twenty-five thousand dollars (\$25,000.00 exclusive of punitive damages, interest, costs and attorney fees.

Signature: *S. Vallejos*
Printed Name: *Vallejos, Serald E.*
Law Firm: _____
Address: *6304 Buena Vista N.W.*
City/Zip: *Albuquerque 87120*
Phone: *505-874-7422*

I hereby certify that an endorsed copy of the foregoing pleadings was mailed or delivered to all parties entitled to notice on this 4th day of February 2011.

Signature: *S. Vallejos*

STATE OF NEW MEXICO
COUNTY OF BERNALILLO
SECOND JUDICIAL DISTRICT

No. **CV 20110 1355**

Gerald E. Vallejos
Plaintiff,

vs. Lovelace medical Center, et al

Defendant.

SUMMONS

THE STATE OF NEW MEXICO

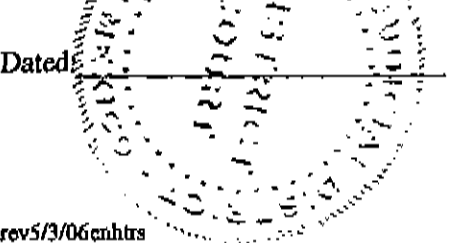
TO: Jennifer Hollen, Defendant
ADDRESS: 601 Martin Luther King AV, ALBU, NM 87102

You are required to serve upon _____ an answer
(name of Plaintiff/Plaintiff's Attorney)
or motion in response to the complaint which is attached to this summons within thirty (30) days
after service of this summons upon you, exclusive of the say of service, and file a copy of your
answer or motion with the Court as provided in RULE 1-005 NMRA.

If you fail to file a timely answer or motion, default judgement may be entered against
you for the relief demanded in the Complaint/Petition.

Attorney(s) for Plaintiff/Plaintiff Pro Se:
Gerald E. Vallejos
name, address and telephone of attorney for Plaintiff
(or of Plaintiff, if no attorney)
6304 Blunden Circle N.W.
Street or P.O. Box
ALBU NM 87120
City, state and zip code
505-974-7422
telephone

WITNESS the Honorable TED BACA, district judge of the
Second Judicial District Court of the State of New Mexico, and the seal of the district court of Bernalillo
County, this _____ day of FEB 04 2011, 20____.



JUANITA DURAN
CLERK OF COURT
By Raulo Perez
Deputy

SECOND JUDICIAL DISTRICT COURT
COUNTY OF BERNALILLO
STATE OF NEW MEXICO

FILED IN MY OFFICE THIS

FEB - 4 2011

Plaintiff: Vallejos, Gerald E.

Vs.

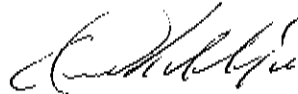
Defendant: Lovelace Medical Center, 601 Martin Luther King Av., Albuquerque, NM 87102

co-defendants: Carmen Smith-Salazar, Josephine Gorospe, Suzette Harris, Jennifer Holler, Sarah Atkinson, and Kevin Sinclair.

Subject: Civil complaint for wrongful termination.

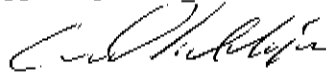
CV 20110 1355

Defendants retaliated against me for engaging in protected activities as defined under Title VII Of the Civil Rights Act of 1964 (Title VII), and the New Mexico Human Rights Act of 1969, and for filing employment discrimination charges 543-2009-00733, 543-2009-01162, and 543-2010-00698 dated 30Nov2010. Co-defendants retaliated against me by creating a hostile work environment for me, by defamation which was both cruel and malicious. The employer (Lovelace Medical Center) Sarah Atkinson, Nurse Manager, and Kevin Sinclair, Director Critical Care floor, denied me due process under the law. Allegations, and charges brought against me by other employees were never properly investigated. The personal relationship the manager and director had with the other co-defendants influenced their decision making, the decision not to allow me favorable personnel actions, the decision to terminate me after 19 years of service. I seek damages for loss of income, damage to my reputation as a Registered Nurse, for mental and Emotional anguish, for having to retire years earlier than I had planned.



Vallejos, Gerald E.
6304 Buenos Aires NW
Albuquerque, New Mexico 87120
505-974-7422

I certify that I have mailed a copy of this pleading to opposing counsel:



Vallejos, Gerald E.

LOUISE PEREZ

LOURDES PEREZ

SECOND JUDICIAL DISTRICT COURT
COUNTY OF BERNALILLO
STATE OF NEW MEXICO

ENDORSED
FILED IN MY OFFICE THIS
FEB 4 2011

D-202-CV- CV 201101555

Quantita M. Luano
CLERK DISTRICT COURT

Serald E. Vallejos

PLAINTIFF

VS Lovelace Medical Center, 601 Martin Luther King AV, Albuquerque, NM 87102
Carmen Smith Salazar, Josephine Gonzalez, Suzette Hernandez, Jennifer Hollen,
Sarah Atkinson, Kevin Sinclair.

DEFENDANT

COURT-ANNEXED ARBITRATION CERTIFICATION

(Party and Attorney) _____

pursuant to Second Judicial District Court Local Rule 2-603, certifies as follows:

_____ This party seeks only money judgment and the amount sought does not exceed twenty-five thousand dollars (\$25,000.00) exclusive of punitive damages, interest, costs and attorney fees.

☒ This party seeks relief other than a money judgment and/or seeks relief in excess of twenty-five thousand dollars (\$25,000.00 exclusive of punitive damages, interest, costs and attorney fees.

Signature: _____

Printed Name: Vallejos, Serald E.

Law Firm: _____

Address: 6304 Buena Vista N.W.

City/Zip: Albuquerque 87120

Phone: 505-974-7422

I hereby certify that an endorsed copy of the foregoing pleadings was mailed or delivered to all parties entitled to notice on this 4th day of February 2011.

Signature: _____

Serald E. Vallejos

STATE OF NEW MEXICO
COUNTY OF BERNALILLO
SECOND JUDICIAL DISTRICT

No. CV 20110 1355

Gerald E. Valleron
Plaintiff,

vs. Lovelace medical center and co-defendants: Sarah Atkinson, Kevin Sinclair,
Carmen Smith Salazar, Josephine Gonsky, Suzette Hanne, Jennifer Hollen.
Defendant.

SUMMONS

THE STATE OF NEW MEXICO

TO: Carmen Smith-Salazar, Defendant
ADDRESS: 601 Martin Luther King Ave., Albuquerque, NM 87102

You are required to serve upon _____ an answer
(name of Plaintiff/Plaintiff's Attorney)

or motion in response to the complaint which is attached to this summons within thirty (30) days after service of this summons upon you, exclusive of the day of service, and file a copy of your answer or motion with the Court as provided in RULE 1-005 NMRA.

If you fail to file a timely answer or motion, default judgement may be entered against you for the relief demanded in the Complaint/Petition.

Attorney(s) for Plaintiff/Plaintiff Pro Se:

Gerald Valleron
name, address and telephone of attorney for Plaintiff
(or of Plaintiff, if no attorney)
6304 Bluenote Circle N.W.
Street or P.O. Box
Albuquerque, N.M. 87120
City, state and zip code
505-974-7422
telephone

WITNESS the Honorable TED BACA, district judge of the
Second Judicial District court of the State of New Mexico, and the seal of the district court of Bernalillo
County this _____ day of FEB 04 2011, 20____.

Dated: _____
JUANITA DURAN
CLERK OF COURT
By [Signature]
Deputy

SECOND JUDICIAL DISTRICT COURT
COUNTY OF BERNALILLO
STATE OF NEW MEXICO

44/ ENDORSED
FILED IN MY OFFICE THIS

FEB - 4 2011

Plaintiff: Vallejos, Gerald E.

Vs.

Defendant: Lovelace Medical Center, 601 Martin Luther King Av., Albuquerque, NM 87102
co-defendants: Carmen Smith-Salazar, Josephine Gorospe, Suzette Harris, Jennifer Holler, Sarah Atkinson, and Kevin Sinclair.

Subject: Civil complaint for wrongful termination.

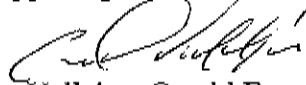
CV 20110 1355

Defendants retaliated against me for engaging in protected activities as defined under Title VII Of the Civil Rights Act of 1964 (Title VII), and the New Mexico Human Rights Act of 1969, and for filing employment discrimination charges 543-2009-00733, 543-2009-01162, and 543-2010-00698 dated 30Nov2010. Co-defendants retaliated against me by creating a hostile work environment for me, by defamation which was both cruel and malicious. The employer (Lovelace Medical Center) Sarah Atkinson, Nurse Manager, and Kevin Sinclair, Director Critical Care floor, denied me due process under the law. Allegations, and charges brought against me by other employees were never properly investigated. The personal relationship the manager and director had with the other co-defendants influenced their decision making, the decision not to allow me favorable personnel actions, the decision to terminate me after 19 years of service. I seek damages for loss of income, damage to my reputation as a Registered Nurse, for mental and Emotional anguish, for having to retire years earlier than I had planned.



Vallejos, Gerald E.
6304 Buenos Aires NW
Albuquerque, New Mexico 87120
505-974-7422

I certify that I have mailed a copy of this pleading to opposing counsel:



Vallejos, Gerald E.

SECOND JUDICIAL DISTRICT COURT
COUNTY OF BERNALILLO
STATE OF NEW MEXICO

4 Feb 2011
ENDORSED
FILED IN MY OFFICE THIS

FEB - 4 2011

D-202- CV- _____

CV 201101355

Gerald E. Vallejos

Quanita M. Duran
CLERK DISTRICT COURT

PLAINTIFF

VS Lovelace Medical Center 601 MARTIN LUTHER KING AV. ALBUQUERQUE, NM 87102
Carmen-Smith Salazar, Josephine Gonzales, Suzette Hannick, Jennifer Holley,
Sarah ATKINSON, Kevin Sinclair.

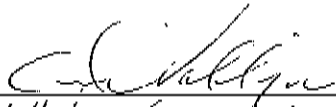
DEFENDANT

COURT-ANNEXED ARBITRATION CERTIFICATION

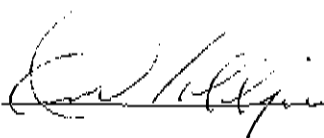
(Party and Attorney) _____
pursuant to Second Judicial District Court Local Rule 2-603, certifies as follows:

_____ This party seeks only money judgment and the amount sought does not exceed
twenty-five thousand dollars (\$25,000.00) exclusive of punitive damages, interest, costs and
attorney fees.

☒ This party seeks relief other than a money judgment and/or seeks relief in excess of
twenty-five thousand dollars (\$25,000.00 exclusive of punitive damages, interest, costs and
attorney fees.

Signature: 
Printed Name: Vallejos, Gerald E.
Law Firm: _____
Address: 6304 Buena Vista Ave. N.W.
City/Zip: Albuquerque 87120
Phone: 505-874-7422

I hereby certify that an endorsed copy of the foregoing pleadings was mailed or delivered to all
parties entitled to notice on this 4th day of February
2011.

Signature: 

STATE OF NEW MEXICO
COUNTY OF BERNALILLO
SECOND JUDICIAL DISTRICT

No. **CV 201101355**

Gerald E. Vallejos
Plaintiff,

vs. Lovelace medical Center and Co-defendants: Sarah Atkinson, Kevin Sinclair,
Carmel Smith-Salazar, Josephine Gonzalez, Suzette Harniss, Jennifer Holten

Defendant.

SUMMONS

THE STATE OF NEW MEXICO

TO: Suzette Harniss, Defendant
ADDRESS: 601 Martin Luther King Av APO, NM 87102

You are required to serve upon Gerald E. Vallejos an answer
(name of Plaintiff/Plaintiff's Attorney)

or motion in response to the complaint which is attached to this summons within thirty (30) days
after service of this summons upon you, exclusive of the day of service, and file a copy of your
answer or motion with the Court as provided in RULE 1-005 NMRA.

If you fail to file a timely answer or motion, default judgement may be entered against
you for the relief demanded in the Complaint/Petition.

Attorney(s) for Plaintiff/Plaintiff Pro Se:

Gerald E. Vallejos
name, address and telephone of attorney for Plaintiff
(or of Plaintiff, if no attorney)

6304 Guadalupe Circle N.W.

Street or P.O. Box
Albuquerque, N.M. 87120

City, state and zip code
505-974-7422

telephone

TED BACA

WITNESS the Honorable _____, district judge of the
Second Judicial District court of the State of New Mexico, and the seal of the district court of Bernalillo
County, this _____ day of FEB 04 2011, 20____.

Dated: _____

JUANITA DURAN
CLERK OF COURT

By Raulo Perez
Deputy

Case 1:11-cv-00206-WJ-KBM Document 1-1 Filed 03/08/11 Page 12 of 22
SECOND JUDICIAL DISTRICT COURT
COUNTY OF BERNALILLO
STATE OF NEW MEXICO

FILED
ENDORSED
FILED IN MY OFFICE THIS

FEB - 4 2011

Plaintiff: Vallejos, Gerald E.

Vs.

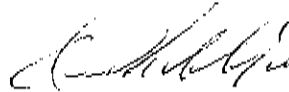
Defendant: Lovelace Medical Center, 601 Martin Luther King Av., Albuquerque, NM 87102

co-defendants: Carmen Smith-Salazar, Josephine Gorospe, Suzette Harris, Jennifer Holler, Sarah Atkinson, and Kevin Sinclair.

Subject: Civil complaint for wrongful termination.

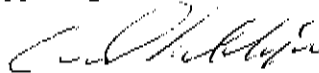
CV 20110 1355

Defendants retaliated against me for engaging in protected activities as defined under Title VII Of the Civil Rights Act of 1964 (Title VII), and the New Mexico Human Rights Act of 1969, and for filing employment discrimination charges 543-2009-00733, 543-2009-01162, and 543-2010-00698 dated 30Nov2010. Co-defendants retaliated against me by creating a hostile work environment for me, by defamation which was both cruel and malicious. The employer (Lovelace Medical Center) Sarah Atkinson, Nurse Manager, and Kevin Sinclair, Director Critical Care floor, denied me due process under the law. Allegations, and charges brought against me by other employees were never properly investigated. The personal relationship the manager and director had with the other co-defendants influenced their decision making, the decision not to allow me favorable personnel actions, the decision to terminate me after 19 years of service. I seek damages for loss of income, damage to my reputation as a Registered Nurse, for mental and Emotional anguish, for having to retire years earlier than I had planned.



Vallejos, Gerald E.
6304 Buenos Aires NW
Albuquerque, New Mexico 87120
505-974-7422

I certify that I have mailed a copy of this pleading to opposing counsel:



Vallejos, Gerald E.

LOUPOES PEREZ

SECOND JUDICIAL DISTRICT COURT
COUNTY OF BERNALILLO
STATE OF NEW MEXICO

ENDORSED
FILED IN MY OFFICE THIS

FEB 4 2011

COURTES PEREZ

D-202-CV- CV 2010 1350

Quanita M. L. Lomas
CLERK DISTRICT COURT

Sergio E. Vallejo

PLAINTIFF

VS Lovelace Medical Center, 601 Martin Luther King Ave, Albuquerque, NM 87102
Carmen Smith Solaz, Josephine Gonzalez, Susan Harrison, Jennifer Holley,
Sarah Atkinson, Kevin Sinclair.

DEFENDANT

COURT-ANNEXED ARBITRATION CERTIFICATION

(Party and Attorney) _____
pursuant to Second Judicial District Court Local Rule 2-603, certifies as follows:

_____ This party seeks only money judgment and the amount sought does not exceed
twenty-five thousand dollars (\$25,000.00) exclusive of punitive damages, interest, costs and
attorney fees.

☒ This party seeks relief other than a money judgment and/or seeks relief in excess of
twenty-five thousand dollars (\$25,000.00) exclusive of punitive damages, interest, costs and
attorney fees.

Signature: *Sergio E. Vallejo*
Printed Name: Vallejo, Sergio E.
Law Firm: _____
Address: 6304 Buena Vista N.W.
City/Zip: Albuquerque 87120
Phone: 505 974-7422

I hereby certify that an endorsed copy of the foregoing pleadings was mailed or delivered to all
parties entitled to notice on this 4th day of February
2011.

Signature: *Sergio E. Vallejo*

STATE OF NEW MEXICO
COUNTY OF BERNALILLO
SECOND JUDICIAL DISTRICT

No. **CV 20110 1355**

Gerald E. Valledor
Plaintiff,

vs. Lovelace Medical Center, and co-defendants: Sarah Atkinson, Kevin Sinclair,
Carmen Smith-Salazar, Josephine Gonzalez, Suzette Hanning, Jennifer Hollen.
Defendant.

SUMMONS

THE STATE OF NEW MEXICO

TO: Sarah Atkinson, Defendant
ADDRESS: 601 Martin Luther King AV Albuquerque, NM 87102

You are required to serve upon Gerald Valledor an answer
(name of Plaintiff/Plaintiff's Attorney)

or motion in response to the complaint which is attached to this summons within thirty (30) days after service of this summons upon you, exclusive of the day of service, and file a copy of your answer or motion with the Court as provided in RULE 1-005 NMRA.

If you fail to file a timely answer or motion, default judgement may be entered against you for the relief demanded in the Complaint/Petition.

Attorney(s) for Plaintiff/Plaintiff Pro Se:

Gerald Valledor
name, address and telephone of attorney for Plaintiff
(or of Plaintiff, if no attorney)

6304 Buena Vista Ave. N.W.

Street or P.O. Box
Albuquerque, NM 87120

City, state and zip code
505-974-7422

telephone

WITNESS the Honorable TED BACA, district judge of the
Second Judicial District Court of the State of New Mexico, and the seal of the district court of Bernalillo
County, this _____ day of _____, 20____.

Dated: _____

JUANITA DURAN
CLERK OF COURT

By Laura P. Perez
Deputy

SECOND JUDICIAL DISTRICT COURT
COUNTY OF BERNALILLO
STATE OF NEW MEXICO

4 Feb 2011
ENDORSED
FILED IN MY OFFICE THIS

FEB - 4 2011

Plaintiff: Vallejos, Gerald E.

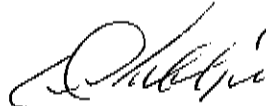
Vs.

Defendant: Lovelace Medical Center, 601 Martin Luther King Av., Albuquerque, NM 87102 and
co-defendants: Carmen Smith-Salazar, Josephine Gorospe, Suzette Harris, Jennifer Horder, Sarah
Atkinson, and Kevin Sinclair.

CY 20112 13 50

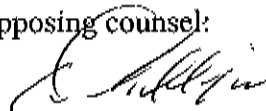
Subject: Civil complaint for wrongful termination.

Defendants retaliated against me for engaging in protected activities as defined under Title VII Of the Civil Rights Act of 1964 (Title VII), and the New Mexico Human Rights Act of 1969, and for filing employment discrimination charges 543-2009-00733, 543-2009-01162, and 543-2010-00698 dated 30Nov2010. Co-defendants retaliated against me by creating a hostile work environment for me, by defamation which was both cruel and malicious. The employer (Lovelace Medical Center) Sarah Atkinson, Nurse Manager, and Kevin Sinclair, Director Critical Care floor, denied me due process under the law. Allegations, and charges brought against me by other employees were never properly investigated. The personal relationship the manager and director had with the other co-defendants influenced their decision making, the decision not to allow me favorable personnel actions, the decision to terminate me after 19 years of service. I seek damages for loss of income, damage to my reputation as a Registered Nurse, for mental and Emotional anguish, for having to retire years earlier than I had planned.



Vallejos, Gerald E.
6304 Buenos Aires NW
Albuquerque, New Mexico 87120
505-974-7422

I certify that I have mailed a copy of this pleading to opposing counsel:


Vallejos, Gerald E.

SECOND JUDICIAL DISTRICT COURT
COUNTY OF BERNALILLO
STATE OF NEW MEXICO

D-202-CV- **CV** 20110 1355

4 Feb 2011

ENDORSED
FILED IN MY OFFICE THIS
FEB 4 2011

Sergio E. Vallejos
PLAINTIFF

VS Lovelace Medical Center, 601 Martin Luther King Av. Albuquerque, NM 87102
Carmen-Smith Salazar, Josephine Gonsales, Suzette Hannon, Jennifer Hollen,
Sarah Atkinson, Kevin Sinclair.

DEFENDANT

Quanita M. Duran
CLERK DISTRICT COURT

COURT-ANNEXED ARBITRATION CERTIFICATION

(Party and Attorney)

pursuant to Second Judicial District Court Local Rule 2-603, certifies as follows:

 This party seeks only money judgment and the amount sought does not exceed twenty-five thousand dollars (\$25,000.00) exclusive of punitive damages, interest, costs and attorney fees.

☒ This party seeks relief other than a money judgment and/or seeks relief in excess of twenty-five thousand dollars (\$25,000.00 exclusive of punitive damages, interest, costs and attorney fees.

Signature: [Signature]
Printed Name: Vallejos, Sergio E.
Law Firm: _____
Address: 6304 Buena Vista Ave. N.W.
City/Zip: Albuquerque 87120
Phone: 505-874-7422

I hereby certify that an endorsed copy of the foregoing pleadings was mailed or delivered to all parties entitled to notice on this 4th day of February 2011.

Signature: [Signature]

STATE OF NEW MEXICO
COUNTY OF BERNALILLO
SECOND JUDICIAL DISTRICT

14 Feb 2011

No. CV 20110 1355

Gerald E. Vallejos
Plaintiff,
vs. Lovelace Medical Center and
Sarah ATKINSON, Kevin Sinclair

Carmen Smith-Salazar, Josephine Goroapa, Suzette Hatten, Harnia, Jennifer Holler.
Defendant.

SUMMONS

THE STATE OF NEW MEXICO

TO: Lovelace Medical Center f
co-dependant Defendant
ADDRESS: 601 MARTIN LUTHER KING AV NW, ALBU, NM 87102

You are required to serve upon Gerald E. Vallejos an answer
(name of Plaintiff/Plaintiff's Attorney)

or motion in response to the complaint which is attached to this summons within thirty (30) days
after service of this summons upon you, exclusive of the day of service, and file a copy of your
answer or motion with the Court as provided in RULE 1-005 NMRA.

If you fail to file a timely answer or motion, default judgement may be entered against
you for the relief demanded in the Complaint/Petition.

Attorney(s) for Plaintiff/Plaintiff Pro Se:

Gerald E. Vallejos
name, address and telephone of attorney for Plaintiff
(or of Plaintiff, if no attorney)
6304 BUENOS AIRES N.W
Street or P.O. Box
Albuquerque, New Mexico 87120
City, state and zip code
505-974-7422
telephone

TED BACA

WITNESS the Honorable _____, district judge of the
Second Judicial District court of the State of New Mexico, and the seal of the district court of Bernalillo
County, this _____ day of FEB 04 2011, 20____.

Dated: _____

JUANITA DURAN
CLERK OF COURT
By Amanda Ruiz
Deputy

SECOND JUDICIAL DISTRICT COURT
COUNTY OF BERNALILLO
STATE OF NEW MEXICO

4 Feb 2011
ENDORSED
FILED IN MY OFFICE THIS

FEB - 4 2011

Plaintiff: Vallejos, Gerald E.

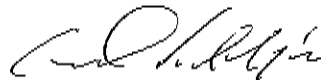
Vs.

Defendant: Lovelace Medical Center, 601 Martin Luther King Av., Albuquerque, NM 87120 and
co-defendants: Carmen Smith-Salazar, Josephine Gorospe, Suzette Harris, Jennifer Hollar, Sarah
Atkinson, and Kevin Sinclair.

Subject: Civil complaint for wrongful termination.

CV 20110 13 55

Defendants retaliated against me for engaging in protected activities as defined under Title VII Of the Civil Rights Act of 1964 (Title VII), and the New Mexico Human Rights Act of 1969, and for filing employment discrimination charges 543-2009-00733, 543-2009-01162, and 543-2010-00698 dated 30Nov2010. Co-defendants retaliated against me by creating a hostile work environment for me, by defamation which was both cruel and malicious. The employer (Lovelace Medical Center) Sarah Atkinson, Nurse Manager, and Kevin Sinclair, Director Critical Care floor, denied me due process under the law. Allegations, and charges brought against me by other employees were never properly investigated. The personal relationship the manager and director had with the other co-defendants influenced their decision making, the decision not to allow me favorable personnel actions, the decision to terminate me after 19 years of service. I seek damages for loss of income, damage to my reputation as a Registered Nurse, for mental and Emotional anguish, for having to retire years earlier than I had planned.



Vallejos, Gerald E.
6304 Buenos Aires NW
Albuquerque, New Mexico 87120
505-974-7422

I certify that I have mailed a copy of this pleading to opposing counsel:



Vallejos, Gerald E.

SECOND JUDICIAL DISTRICT COURT
COUNTY OF BERNALILLO
STATE OF NEW MEXICO

4 Feb 2011

ENDORSED
FILED IN MY OFFICE THIS

FEB - 4 2011

D-202-CV- **CV 20110 1355**

Gerald E. Vallejos
PLAINTIFF

VS Lovelace Medical Center, 601 Martin Luther King, Jr. Ave., Albuquerque, NM 87102
Carmen-Smith Salazar, Josephine Gonzalez, Suzanne Harris, Jennifer Hollen,
Sarah Atkinson, Kevin Sinclair.

DEFENDANT

COURT-ANNEXED ARBITRATION CERTIFICATION

(Party and Attorney) _____
pursuant to Second Judicial District Court Local Rule 2-603, certifies as follows:

_____ This party seeks only money judgment and the amount sought does not exceed
twenty-five thousand dollars (\$25,000.00) exclusive of punitive damages, interest, costs and
attorney fees.

☒ This party seeks relief other than a money judgment and/or seeks relief in excess of
twenty-five thousand dollars (\$25,000.00 exclusive of punitive damages, interest, costs and
attorney fees.

Signature: Gerald E. Vallejos
Printed Name: Vallejos, Gerald E.
Law Firm: _____
Address: 6304 Buena Vista Ave. N.W.
City/Zip: Albuquerque 87120
Phone: 505-874-7422

I hereby certify that an endorsed copy of the foregoing pleadings was mailed or delivered to all
parties entitled to notice on this 4th day of February
2011.

Signature: Gerald E. Vallejos

STATE OF NEW MEXICO
COUNTY OF BERNALILLO
SECOND JUDICIAL DISTRICT

No. **CV 20110 1355**

Gerald E. Valleja
Plaintiff,

vs.

Lovelace Medical Center et al
Defendant.

SUMMONS

THE STATE OF NEW MEXICO

TO: Josephine Gonzales, Defendant
ADDRESS: 601 MARTIN LUTHER KING AV ALBU, NM 87102

You are required to serve upon Gerald E. Valleja an answer
(name of Plaintiff/Plaintiff's Attorney)

or motion in response to the complaint which is attached to this summons within thirty (30) days after service of this summons upon you, exclusive of the day of service, and file a copy of your answer or motion with the Court as provided in RULE 1-005 NMRA.

If you fail to file a timely answer or motion, default judgement may be entered against you for the relief demanded in the Complaint/Petition.

Attorney(s) for Plaintiff/Plaintiff Pro Se:

Gerald E. Valleja
name, address and telephone of attorney for Plaintiff
(or of Plaintiff, if no attorney)

6304 BUENOS AIRES N.W.

Street or P.O. Box

ALBU, NM 87120

City, state and zip code

505-974-7422

telephone

WITNESS the Honorable TED BACA, district judge of the
Second Judicial District Court of the State of New Mexico, and the seal of the district court of Bernalillo
County, this FEB 04 2011 day of 20.

Dated:

JUANITA DURAN
CLERK OF COURT

By Raula Perez
Deputy

SECOND JUDICIAL DISTRICT COURT
COUNTY OF BERNALILLO
STATE OF NEW MEXICO

4 Feb 2011
**ENDORSED
FILED IN MY OFFICE THIS**

FEB 4 2011

Plaintiff: Vallejos, Gerald E.

Vs.

Defendant: Lovelace Medical Center, 601 Martin Luther King Av., Albuquerque, NM 87120 and

co-defendants: Carmen Smith-Salazar, Josephine Gorospe, Suzette Harris, Jennifer Höller, Sarah

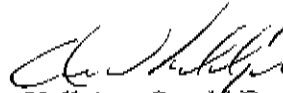
Atkinson, and Kevin Sinclair.

CLERK DISTRICT COURT

Subject: Civil complaint for wrongful termination.

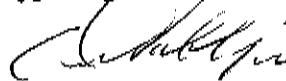
CV 20110 13 55

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Vallejos, Gerald E.
6304 Buenos Aires NW
Albuquerque, New Mexico 87120
505-974-7422

I certify that I have mailed a copy of this pleading to opposing counsel:



Vallejos, Gerald E.

Signature: